Testimony
Elizabeth Gara
Connecticut Water Works Association (CWWA)
Before the
Public Safety Committee
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The Connecticut Water Works Association (CWWA), a trade association of municipal, regional and private water utilities, **opposes HB-5278 - AN ACT CONCERNING AUTOMATIC FIRE EXTINGUISHING SYSTEMS IN RESIDENTIAL BUILDINGS DESIGNED TO BE OCCUPIED BY TWO FAMILIES, as currently drafted.**

Given our responsibility to ensure that public water supply systems meet health standards and are protected from potential contamination, the installation of fire sprinklers raises several concerns that are not addressed in the bill. The Public Health Code outlines specific requirements that must be adhered to in order to protect public water supplies from potential contamination from cross connections in installing certain water systems, including sprinklers.

To help prevent potential contamination, a Double Check Valve Assembly (DCVA) or Reduced Pressure principle backflow preventer is mandatory on fire service lines fitted with a Siamese connection and on fire service lines to unheated areas where antifreeze is added. .

There have also been issues with certain fire sprinkler systems because the pressure and volume demands in a fire emergency can draw non-potable water into the public water supply system. It is our understanding that installers would only be permitted to install "flow through" sprinkler systems which are not terminated at a dead-ended section of pipe but connected to a plumbing fixture. This provision which would prevent the back flow of non-potable water into the public water supply system is not reflected in the language of the bill.

It is our understanding that there has been some discussion about allowing installers to connect the fire sprinkler systems to the domestic water line *before* the meter. This is contrary to existing practices because water companies are required to ensure that all water to a property is metered and that such meters meet certain requirements.

Currently, the Public Health Code requires that any person engaged in the installation or modification of an automatic fire extinguishing system in any building served by a public water system must notify the public water system of such installation and comply with all applicable rules of such public water system. Unfortunately, water companies are seldom advised of such installations until they perform cross connection inspections. Without such notification, water companies can't take steps to determine whether the system includes appropriate back flow preventers and meets other requirements and how the system may impact water pressure and volume.

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Members of the Connecticut Section of the American Water Works Association Cross Connection Committee met with representatives of the Fire Sprinklers Association to review proposed designs and discuss concerns. However, the proposed designs would be connected to the domestic water supply, creating considerable concern about the impact on public water supplies. To address this concern, under the Public Health Code, fire lines must be installed and maintained as separate lines to the property.

Unfortunately, as drafted, the bill cedes authority to the State Fire Marshal's Office to determine design and installation requirements for fire suppression systems. This will allow the installation of fire sprinklers to bypass the Public Health Code as well as the water systems' Rules and Regulations, undermining efforts to protect the quality and safety of public supplies.

It is also unclear how the bill will impact termination of water services for nonpayment, raising concerns regarding liability if the water service is terminated and undermining collection of unpaid accounts if water companies are prohibited from terminating service due to the existence of a fire sprinkler.

CWWA stands ready to continue to meet with parties to discuss these concerns. However, protecting the quality and safety of our public water supplies is of paramount importance to us in these discussions.

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